

Law Offices

# HOLLAND & KNIGHT LLP

2100 Pennsylvania Avenue, N.W.  
Suite 400  
Washington, D.C. 20037-3202

202-955-3000  
FAX 202-955-5564  
www.hklaw.com

RECEIVED

AUG 3 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

August 3, 2000

Atlanta  
Boston  
Bradenton  
Chicago  
Fort Lauderdale  
Jacksonville  
Lakeland  
Melbourne  
Mexico City  
Miami  
New York

Northern Virginia  
Orlando  
Providence  
San Francisco  
St. Petersburg  
Tallahassee  
Tampa  
Washington, D.C.  
West Palm Beach  
Representative Offices:  
Buenos Aires  
Tel Aviv

ARTHUR B. GOODKIND  
202-202-457-1815

Internet Address:  
agoodkin@hklaw.com

DOCKET FILE COPY ORIGINAL

VIA HAND DELIVERY

Ms. Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

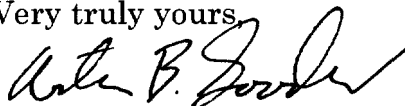
Re: MM Docket No. 00-15, RM-9884, Amendment of Section 73.622(b),  
Table of Allotments, Digital Television Broadcast Stations (Redding,  
California) to substitute Channel 34 for Channel 14

Dear Ms. Salas:

Transmitted herewith, on behalf of California Broadcasting, Inc., licensee  
of television station KRCR-TV, Redding, California, are an original and four  
copies of its "Comments" in the above-referenced proceeding.

In the event there are any questions, please communicate with the  
undersigned.

Very truly yours,



Arthur B. Goodkind

Enclosure

cc(w/enc.): Kathleen Victory, Esq.  
Clay Pendarvis, Esq.  
John Morgan

No. of Copies rec'd 0+4  
List A B C D E

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.622(b),	)	MM Docket No. 00-115
Table of Allotments,	)	RM-9884
Digital Television Broadcast Stations.	)	
(Redding, California)	)	

COMMENTS OF CALIFORNIA BROADCASTING, INC.

California Broadcasting, Inc. ("California Broadcasting"), licensee of television station KRCR-TV, NTSC Channel 7, Redding, California, files herewith, by its attorneys, its comments with respect to the DTV channel substitution proposed by the Commission in the above-captioned proceeding.

This rule making was initiated at the request of California Broadcasting, which filed a petition on September 8, 1999 requesting the substitution of DTV Channel 34 for DTV Channel 14 as the digital transition channel allotted for use by KRCR-TV in Redding. California Broadcasting's request was based on anticipated interference from a KRCR-TV DTV operation on Channel 14 to private radio facilities at the same location.

After the Commission's Notice of Proposed Rule Making was issued in this proceeding, it was determined that the proposed operation of KRCR-TV on Channel 34 would cause serious interference to LPTV station KCSO-LP, Sacramento,

California, which is operated by an affiliate of Sainte Partners II, L.P. ("Sainte"), licensee of station KCVU-TV, Paradise, California. Although LPTV station KCSO-LP is not entitled to protection from a Channel 34 DTV substitution at Redding, the licensees of KRCR-TV and KCVU-TV determined that a swap of the presently allotted DTV channels of those two stations could be made in conformance with the Commission's rules. Such a swap would eliminate the necessity of making the Channel 34 substitution at Redding and would at the same time resolve the potential private radio interference problems at KRCR-TV's Redding site.

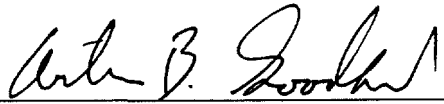
Accordingly, California Broadcasting and Sainte agreed to file, and did file on July 25, 2000, channel swap applications pursuant to Section 73.623(c) of the Commission's Rules. Upon grant of those applications, KRCR-TV's allotted DTV channel at Redding would change from 14 to 20 and KCVU-TV's allotted DTV channel at Paradise would change from 20 to 14. The two swap applications are presently pending. At such time as the applications are granted and the grants become final, there will be no need to make the channel substitution proposed in this rule making proceeding.

California Broadcasting therefore respectfully requests that the Commission hold this rule making proceeding in abeyance pending action on the KRCR-TV/KCVU-TV swap applications. Upon final action granting those applications, this proceeding may be terminated. However, should the swap applications be dismissed or denied for any reason, or if it should appear that it will not be possible to grant the swap applications for a period of time that would materially exceed the

time period necessary to complete this rule making, then California Broadcasting requests that the Channel 34 substitution at Redding be made for the reasons stated in its original petition for rule making. In that event, California Broadcasting would promptly file an application for a construction permit on the substituted channel and would, upon grant of that application, construct its DTV station pursuant to the permit.

Respectfully submitted,

CALIFORNIA BROADCASTING, INC.

By: 

Arthur B. Goodkind  
Holland & Knight, L.L.P.  
2100 Pennsylvania Avenue, N.W.  
Suite 400  
Washington, D.C. 20037

(202) 955-3000

August 3, 2000

## CERTIFICATE OF SERVICE


I, Victoria C. Kim, of Holland & Knight, hereby certify that true copies of the foregoing "Comments of California broadcasting, Inc.," have been served on the parties listed below, via first class mail, postage prepaid on the 3rd day of August, 2000.

\* Clay Pendarvis, Esq.  
Federal Communications Commission  
Mass Media Bureau  
Room 2-A662  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

\* John Morgan  
Federal Communications Commission  
Mass Media Bureau  
Room 2-C864  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Kathleen Victory, Esq.  
Counsel for Sainte Partners II, L.P.  
Fletcher Heald & Hildreth, P.L.C.  
1300 North 17<sup>th</sup> Street  
11<sup>th</sup> Floor  
Arlington, VA 22209-3801

\* Denotes Hand Delivery

  
Victoria C. Kim